

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF ALABAMA NORTHERN DIVISION**

**DeShaun Carter, Shonita Ford, Tarrence)
Gordon, Donald Hawthorne, Kerry Haw-)
thorne, Dana Hooper, Larry Osborne)
Barry Reynolds)**

**Civil Action No.:
2:07-CV-0988-WKW**

Plaintiffs,

vs.

**Daehan Solutions,
Defendant.**

MOTION TO WITHDRAW

Comes now, Byron R. Perkins, Lee Winston and Rod Cooks, counsel for Shonita Ford and Deshaun Carter, and moves to withdraw from the representation of these two plaintiffs. As for cause counsel states as follows:

1. Counsel has contacted or attempted to contact each of the above named plaintiffs, but have been unable to secure the cooperation from these two plaintiffs in responding to the defendant's discovery requests. Counsel has requested and received two extensions by agreement from defense counsel to respond to their discovery requests for these two plaintiffs. However, counsel has still been unable to secure overdue discovery responses from Mr. Carter and Ms. Ford.

2. Counsel believes Ms. Ford no longer wishes to participate in the litigation, but without affirmative instructions is reluctant to dismiss her from this action. Plaintiffs counsel, both Perkins and Winston, have spoken to Carter, but he appears not to grasp the urgency in responding to the discovery request.

3. Counsel fears to move forward at their peril and the peril of the other plaintiffs in this matter who may be adversely affected by the failure of Carter and Ford to timely respond.

WHEREFORE, PREMISES CONSIDERED, counsel respectfully request that they be allowed to withdraw from further representation of Shonita Ford and Deshaun Carter and that Carter and Ford, be allowed to retain other counsel should they decide to prosecute their cases.

Respectfully submitted,

/s/ Byron R. Perkins
Byron R. Perkins
Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that I have this, 19th day of March, 2008, served a copy of the foregoing instrument via Electronic Filing System to the following:

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